

REDACTED - FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200 Greenbelt, Maryland 20770 phone: 301-459-7590, fax: 301-577-5575 internet: www.jsitel.com, e-mail: jsi @jsitel.com

June 25, 2015

Via Hand Delivery

Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12th Street, SW Washington, DC 20554

Re: WC Docket No. 14-58

2015 ETC Annual Report of Brantley Telephone Company

Study Area Code 220347

Dear Ms. Dortch:

On behalf of Brantley Telephone Company ("Brantley"), JSI files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules. Brantley seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information. The redacted version is also being filed this date via the FCC's Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of its Progress Report on its Five-Year Service Quality Improvement Plan as required by Section 54.313(a)(1).

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall
JSI Vice President

301-459-7590

jkuykendall@jsitel.com

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)

¹ 47 C.F.R. §§ 54.313, 54.422.

² Connect America Fund et al., WC Docket No. 10-90 et al., Protective Order, DA 15-712 rel. June 17, 2015 (Protective Order). 47 C.F.R. § 54.313(f)(2).

³ 47 C.F.R. §§ 0.457, 0.459, 54.313(a)(1).



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June 25, 2015

Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12th Street, SW Washington, DC 20554

Re: WC Docket No. 14-58

2015 ETC Annual Report of Brantley Telephone Company

Study Area Code 220347 Request for Confidentiality

Dear Ms. Dortch:

John Staurulakis, Inc. ("JSI"), on behalf of its client Brantley Telephone Company (the "Company") hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission's rules,¹ withholding from public inspection certain information contained in an attachment to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).²

- 1. The information for which the Company is seeking confidential treatment is an attachment to the Company's annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission's rules ("Report").³
- 2. Rate-of-Return Eligible Telecommunications Carriers ("ETCs") must file with the Commission an initial section 54.202(a) Five-Year Service Quality Improvement Plan ("Five-Year Plan") which is contained in the attachment to the 2014 Report.⁴
- 3. The information contained in attachment for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment. Information of this nature is confidential commercial information routinely withheld from public inspection.

¹ 47 C.F.R. §§ 0.457, 0.459.

² 47 C.F.R. § 0.459(b)(1) through (9).

³ 47 C.F.R. §§ 54.313, 54.422.

⁴ See In the Matter of Connect America Fund, WC Docket No. 10-90, Order DA 14-591 (rel. May 1, 2014).

4. With respect to identifying the degree to which the subject attachment concerns a service that is subject to competition, the information is of a financial and competitive nature regarding the provision of telecommunications services. The Line 112 attachment contains competitively sensitive information related to proposed improvements or upgrades and maintenance the Company's network.

In its March 5, 2013 Order, the FCC. The FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories." Accordingly, because the Company is a rate-of-return carrier, it must file a five-year service improvement plan which contains proprietary, competitively sensitive information related to the Company's existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company's existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2019.

- 5. With respect to identifying possible exposure to competitive harm, the information contained in the Line 112 attachment is information that is not customarily released to the public. This information is proprietary to the Company, is unique to the Company's serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company's customers which would place the Company at a competitive disadvantage.
- 6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachment, the Company is filing the attachment under seal. The Company uses the information contained in the Five-Year Plan to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has

⁵ See Connect America Fund et al., WC Docket 10-90 et al., Order, DA 13-332 (rel. Mar. 5, 2013) ("March 5, 2013 Order") at para 9 citing Section 54.202(a) (1) (ii).

been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.

- 7. Any previous versions of this information are not publicly available.
- 8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
- 9. Not applicable.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment.

Please contact the undersigned with any questions regarding this request.

Sincerely,

John Kuykendall JSI Vice President 301-459-7590

jkuykendall@jsitel.com

FCC Form 481 - Carrier Annual Reporting Data Collection Form

REDACTED FOR PUBLIC INSPECTION

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

	Data Collection Form	STED FOR PUBLIC INSPECTION July 20	013
<010>	Study Area Code	220347	
<015>		BRANTLEY TEL CO	
<020>	Program Year	2016	
<030>	Contact Name: Person USAC should contact with questions about this data	Andrea Mathie	
<035>	Contact Telephone Number: Number of the person identified in data line <030>	9124620126 ext.	
<039>	Contact Email Address: Email of the person identified in data line <030>	andrea.mathie@btctelcom.net	
ANNUA	L REPORTING FOR ALL CARRIERS		54.313 54.422 Completion Completion Required Required
<100>	Service Quality Improvement Reporting	(complete attached workshoot	(check box when complete)
		(complete attached worksheet,	
<200> <210>	Outage Reporting (voice)	(complete attached worksheet,	
<300>		o outages to report	· / /
<300>	Unfulfilled Service Requests (voice)		
<310>	Detail on Attempts (voice)		
13107	Detail of Miceriples (Voice)		plac. No. No. No. No.
		(at	tach descriptive document)
			(
<320>	Unfulfilled Service Requests (broadband)		
		·	
<330>	Detail on Attempts (broadband)		
		(a	ttach descriptive document)
400			
<400>	Number of Complaints per 1,000 customers (voice)		
<410>	Fixed 0.0		✓ ✓
<420> <430>	Mobile 0.0 Number of Complaints per 1,000 customers (broad	hand	
<440>	Fixed Fixed	balld)	✓
<450>	Mobile 0.0		
<500>	Service Quality Standards & Consumer Protection F	tules Compliance (check to indicate certification	n)
	220347ga510.pdf		
ر - 10			
<510>		(attached descriptive docum	ment) ✓
<600×	Functionality in Emergency Cityations		
<000>	Functionality in Emergency Situations 220347GA610.pdf	(check to indicate certification)
		(attached descriptive documen	t)
<610>			
<700×	Company Price Offerings (voice)		
<700>	Company Price Offerings (voice) Company Price Offerings (broadband)	(complete attached workshee	
<710>	. , , , , , , , , , , , , , , , , , , ,	(complete attached workshee	
<800>	Operating Companies and Affiliates Tribal Land Offerings (V/N)2	(complete attached worksheet	
	Tribal Land Offerings (Y/N)? Voice Services Rate Comparability Certification	(if yes, complete attached workshee	
1000>	voice services nate comparability certification	Yes	
<1010>		(attach descriptive document	
<1100>	· Certify whether terrestrial backhaul options exist (Yes or No) (if not, check to indicate cert	ification)
-1100/	Co y Wiletiner terrestrial backillaul options exist (in not, theta to multitle tert	,,
<1110>		(complete attached workshee	t)
<1200>	Terms and Condition for Lifeline Customers	(complete attached workshee	rt)
	Price Cap Carriers, Proceed to Price Cap Additional	Documentation Worksheet	
	Including Rate-of-Return Carriers affiliated with Pi		
<2000>		(check to indicate certification	
<2005>	Data of Datama Courts of Data at 1997	(complete attached worksheet	
~2000s	Rate of Return Carriers, Proceed to ROR Additional		
<3000> <3005>		(check to indicate certification (complete attached worksheet	4 7 7 7 7 7
-2002/		(complete uttucheu worksneet	7 TOTAL THE

(100) 50	(100) Comico Ouslity Immerorament Donosting		ECC Form 400
Data Co	Labor Service Quanty improvement neporting Data Collection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	220347	
<015>	Study Area Name	BRANTLEY TEL CO	
<020>	Program Year	2016	
<030>	Contact Name - Person USAC should contact regarding this data	Andrea Mathie	
<032>	Contact Telephone Number - Number of person identified in data line <030>	9124620126 ext.	
<039>	Contact Email Address - Email Address of person identified in data line <030>	andrea.mathie@btctelcom.net	.com.net
<110>	Has your company received its ETC certification from the FCC?) (ou / sə/)	
<111>	If your answer to Line <110> is yes, do you have an existing $\S 54.202(a)$ "5 year plan" filed with the FCC?) (ou / sə/)	00
<112>	If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service. Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.		220347gal12.pdf
			Name of Attached Document
	Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.	n year	
<113>	Maps detailing progress towards meeting plan targets Report how much universal service (USF) support was received		Yes Yes
<115><116> 116 117 117	How much (USF) was used to improve service quality and how support was used to improve service quality How much (USF) was used to improve service coverage and how support was used to improve service capacity and how support was used to improve service capacity and how support was used to improve service capacity Provide an explanation of network improvement targets not met		Yes Yes
	in the prior calendar year.		Not Applicable

(200) Service Outage Reporting (Voice)	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010> Study Area Code <015> Study Area Name <020> Program Year	Code										
					220347						
	Name				BRANTLEY TEL CO	L CO					
ı	ar				2016						
<030> Contact Na	Contact Name - Person USAC should contact regarding this data	C should contac	t regarding this	data	Andrea Mathie	ie					
<035> Contact Tel	Contact Telephone Number - Number of person identified in data line	- Number of pe	rson identified	in data line <030>		ext.					
<039> Contact Em	Contact Email Address - Email Address of person identified in data line <030>	ail Address of pe	rson identified	in data line <0		andrea.mathie@btctelcom.net					
<220> <a>	<	<	\$\rm\$03	\$\$	<c1></c1>	<c2></c2>	φ	\ \ \	\$	\ \ \	\$
Re L	Out) M	Outage End Date	pu	Number of Customers Affected	Total	911 Facilities Affected	Service Outage Description (Check	Did This Outage Affect Multiple Study Areas	Service Outage	Preventative
							(Yes / No)	all that apply)	(Yes / No)	Resolution	Procedures

2013 2014 2015	Person USAC should contact regarding this data and the contact regarding this data and the contact regarding this data in colds. Service Charge Effective Date (ATT/2018) Service Charge Effective Date (ATT/2018) Residential Local Service Rate (ATT/2018) Service Charge (UEC) SAC (CETC) Rate Type (ATT/2018) Residential Local Service Rate (ATT/2018) Service Rate (ATT	(700) Price Offerings in	(700) Price Offerings including Voice Rate Data	Data				Ω.	FCC Form 481	
### State Subscriber Line Charge State Subscriber Line Charge	2013.7 2016 Andreas Mathie 9124620126 ext. andrea anathie eigher eigher com neet ch2> ch4> ch4> ch5> ch4> ch4> ch5> ch4> ch4> Service Charge Service Rae Service Charge Service Rae Service Charge Servi							IO N	MB Control No. 3060-0986/OME Ily 2013	3 Control No. 3060-0819
### Action ### A	### State Subscriber Line Charge State Subscriber Line Charge See attached worksheet	Study Area Code				220347				
Andrea Mathie 3124620126 exct. andrea mathie effected com.net ch2> cb3> cb3> cb3> cb5> cb5> cb5> ch5> ch6> con.net ervice Rate See attached worksheet See attached worksheet	Andreas Mathie andrea, mathis electrel comnet andrea, mathis electrel comnet cb2 cb2 cb3 cb3 cb3 cb4 service Rate State Subscriber Line Charge State Universal Service Fee Service Charge Service C	Study Area Name				BRANTLEY TE				
andrea math teleptote loom.net State Subscriber Line Charge State Universal Service Fee Service Charge See affached Worksheet State Universal Service Fee Service Charge See affached Worksheet State Universal Service Fee Service Charge See affached Worksheet State Universal Service Fee Service Charge See affached Worksheet Service Fee Service Fee Service Charge See affached Worksheet Service Fee	### See attached worksheet	Program Year				2016				
andrea, mathis elebtrote icon. net 402> 403> 404> 405> 405> 405> 405> 405> 405> 405	andrea math Heabtotel com.net	e - Pere	son USAC shoul	ld contact regard	ing this data		iie			
andrea mathie abtot ellom net	state a. mat hi selb to te loom . net 1	hone !	Number - Num	ber of person ide	ntified in data line <		ext.			
Charles Char	cbt> cb2> cb3> cb4> cb4> cb5> cb5> cb4> cb5> cb4> cb5> cb5> cb4> cb5> cb4> cb5> cb5> cb5> cb5> cb6> cb6> State Subscriber Line Charge Service Fee Service Charge Charg	Addre	ss - Email Addr	ress of person ide	entified in data line		ie@btctelcom.net			
ch1> ch2> ch3> ch4> ch5> ch5> ch5> ch5> ch4> ch5> ch5> ch5> ch5> ch5> ch5> ch5> ch5	Rate Type Residential local Service Rate Service Rate Service Rate Service Charge State Universal Service Fee Service Charge State Universal Service Fee Service Charge Se	cal Se	vice Charge Ef	fective Date	1/1,	/2015				
SAC (CETC) Rate Type Residential Local Service Rate Service Rate Service Charge State Universal Service Fee Service Charge Ser	SAC (CETC) Rate Type Residential local Service Rate Service Rate Service Rate Service Rate Service Rate Service Rate Service Charge Service C	vide Re	sidential Local	Service Charge						
SAC (CETC) Rate Type Service Rate Service Rate Service Charge Serv	SAC (CETC) Rate Type Residential Local Service Rate Service Rate Service Rate Service Rate Service Charge Service Rate Serv		<a2></a2>	<a3></a3>	 	<	<	 	<	\$
See attached worksheet	See attached worksheet		Exchange (ILEC)	SAC (CETC)	Rate Type	Residential Local Service Rate	State Subscriber Line Charge	State Universal Service Fee	Mandatory Extended Area Service Charge	Total per line Rates and Fees
See attached worksheet	See attached worksheet									•
See attached worksheet	See attached worksheet									
See attached worksheet	See attached worksheet									
See attached worksheet	See attached worksheet									
See attached worksheet	See attached worksheet									
See attached worksheet	See attached worksheet									
See attached worksheet	See attached worksheet									
See attached worksheet	See attached worksheet									
		_				See at	tached worksheet			
						•				

(710) Broadhand Brice Offerings	FCC Form A81
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	<010> Study Area Code	220347
<015>	<015> Study Area Name	BRANTLEY TEL CO
<020>	<020> Program Year	2016
<030>	<030> Contact Name - Person USAC should contact regarding this data	Andrea Mathie
<032>	<035> Contact Telephone Number - Number of person identified in data line <030>	9124620126 ext.
<039>	<039> Contact Email Address - Email Address of person identified in data line <030>	<030> andrea.mathie@btctelcom.net

_													
<d4>></d4>	Usage Allowance Action Taken When Limit Reached { <i>select</i> }												
<d3></d3>	Usage Allowance (GB)												
<d2></d2>	Broadband Service - Upload Speed (Mbps)												
<d1></d1>	Broadband Service - Download Speed (Mbps)												
<>>>	Total Rate and Fees					had	200						
 	State Regulated Fees					- See attacl	workshoot	พบเกรเเฮฮเ =					
 	Residential Rate						•						
<a2></a2>	Exchange (ILEC)												
<a1></a1>	State												
<711>		<u> </u>	 ı	1	ı								

(800) Ok Data Col	(800) Operating Companies Data Collection Form			FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	220347		
<015>	Study Area Name	BRANTLEY TEL CO		
<020>	Program Year	2016		
<030>	Contact Name - Person USAC should contact regarding this data	Andrea Mathie		
<032>	Contact Telephone Number - Number of person identified in data line <030>	9124620126 ext.		
<039>	Contact Email Address - Email Address of person identified in data line <030>	andrea.mathie@btctelcom.net	btctelcom.net	
<810>	Reporting Carrier Brantley Telephone Company			
<811>				
<812>	Operating Company Brantley Telephone Company			
<813>	<a1>></a1>		<a2></a2>	<a3></a3>
	Affiliates		SAC	Doing Business As Company or Brand Designation
		_	_	

(900) Ti Data Co	(900) Tribal Lands Reporting Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	220347
<015>		BRANTLEY TEL CO
<020>		2016
<030>		Andrea Mathie
<035>		9124620126 ext.
<039>		> andrea.mathie@btctelcom.net
<910>	Tribal Land(s) on which ETC Serves	
<920>	. Tribal Government Engagement Obligation	
		Name of Attached Document
If your to conf demon § 54.31 <921> <922> <924> <925> <925> <926> <926> <926> <926> <926> <926> <926> <926> <926> <926> <926> <928> <929> <929> <929> <929> <929> <929> <929> <929> <929> <929> <929> <929> <929> <929> <929> <929> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920> <920>	company serves Tribal lands, please select (Yes,No, NA) for each these boxes irm the status described on the attached document(s), on line 920, strates coordination with the Tribal government pursuant to 3(a)(9) includes: Needs assessment and deployment planning with a focus on Tribal community anchor institutions. Feasibility and sustainability planning; Marketing services in a culturally sensitive manner; Compliance with Rights of way processes Compliance with Eacilities Siting rules Compliance with Environmental Review processes Compliance with Cultural Preservation review processes Compliance with Tribal Business and Licensing requirements.	Select Yes or No or Not Applicable

(1100) N	(1100) No Terrestrial Backhaul Reporting	ECC Form 481
Data Co	Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	220347
<015>	Study Area Name	BRANTLEY TEL CO
<020>	Program Year 2	2016
<030>	Contact Name - Person USAC should contact regarding this data	Andrea Mathie
<032>	Contact Telephone Number - Number of person identified in data line <030>	9124620126 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	andrea.mathie@btctelcom.net
<1120>	Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No).	
<1130>	Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).	Sd

	(1200) Terms and Condition for Lifeline Customers	FCC Form 481
Lifeline Data Colle	Lifeline Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	
<015>	Study Area Name Brantley	LLEY TEL CO
<020>	Program Year 2016	
<030>	Contact Name - Person USAC should contact regarding this data	Andrea Mathie
<032>	Contact Telephone Number - Number of person identified in data line <030>	9124620126 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030> andre	andrea.mathie@btctelcom.net
	220347GA	220347GA1210.pdf
<1210>	<1210> Terms & Conditions of Voice Telephony Lifeline Plans	
		Name of Attached Document
<1220>	Link to Public Website	
"Please ch	"Please check these boxes below to confirm that the attached document(s), on line 1210,	
or the website li. § 54.422(a)(2) a annually report:	or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:	
<1221>	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	
<1222>	Details on the number of minutes provided as part of the plan,	
<1223>	Additional charges for toll calls, and rates for each such plan.	

(2000) Price Cap Carrier Additional Documentation	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers	July 2013
<010> Study Area Code	
<015> Study Area Name 220347	
<020> Program Year ERANTLEY TEL CO	

	7,803.47	BKANILEY TEL CO	2016	c030> Andrea Mathle	9124620126 ext.	andrea.mathle@btctelcom.net
<010> Study Area Code	<015> Study Area Name	<020> Program Year	<030> Contact Name - Person USAC should contact regarding this data	<035> Contact Telephone Number - Number of person identified in data line <030>	<039> Contact Email Address - Email Address of person identified in data line <030>	

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

	Namo of Attachad Document(c) Listine Beauirad Information	nformation	orthe
Incremental Connect America Phase I reporting 2nd Year Certification {47 CFR § 54.313(b)(1)i} 3rd Year Certification {47 CFR § 54.313(b)(1)ii}	Attachment {47 CFR § 54.313(b)(1)ii}	Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)} 2013 Frozen Support Calculation {47 CFR § 54.313(c)(1)} 2014 Frozen Support Calculation {47 CFR § 54.313(c)(1)} 2015 Frozen Support Calculation {47 CFR § 54.313(c)(2)} 2015 Frozen Support Calculation {47 CFR § 54.313(c)(3)} 2016 and future Frozen Support Calculation {47 CFR § 54.313(c)(4)} Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)} Certification Support Used to Build Broadband Connect America Phase II Reporting {47 CFR § 54.313(e)} 3rd year Broadband Service Certification 5th year Broadband Service Certification interim Progress Certification Please check the box to confirm that the attached document(s), on line 2021, contains the required information Please check the box to confirm that the attached document(s), on line 2021, contains the required information of the St. 213 (A)/2011 is a precision of CAE based II connect shall provide the Annual CAE and Annual CA	pursuant to 3 34.313 (e)(3)(ii), as a recipient of CAT ritase it support sitaling provide the number, raines, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year. Interim Progress Community Anchor Institutions
<2010> <2011a>	<2011b>	<pre><2012> <2014> <2014> <2014> <2015> <2015> <2016> <2018> <2018> <2019> <2019> </pre>	<2021>

Name of Attached Document(s) Listing Required Information

NEDAO LED POR POBLIC INSPECTION	FCC Form 481	OMB Control No. 3060-0986/OMB Control No. 3060-0819	July 2013
	Rate Of Return Carrier Additional Documentation	Collection Form	

220347	BRANTLEY TEL CO	2016	Andrea Mathie	9124620126 ext.	andrea.mathie@btctelcom.net	
<010> Study Area Code	<015> Study Area Name	<020> Program Year	<030> Contact Name - Person USAC should contact regarding this data	<035> Contact Telephone Number - Number of person identified in data line <030> 9124620126 ext.	<039> Contact Email Address - Email Address of person identified in data line <030> andrea.mathie@btctelcom.net	
<010>	<015>	<020>	<030>	<032>	<039>	

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47

Name of Attached Document Listing Required Information

DEDACTED FOR DIJBLIC INCRECTION	INCENTAL TO THE POST OF THE PO	FCC Form 481	OMB Control No. 3060-0986/OMB Control No. 3060-0819	July 2013	
		(3000) Rate Of Return Carrier Additional Documentation (Continued)	Data Collection Form		

220347	BRANTLEY TEL CO	2016	Andrea Mathie	9124620126 ext.	andrea.mathie@btctelcom.net
:010> Study Area Code	Study Area Name	Program Year	Contact Name - Person USAC should contact regarding this data	Contact Telephone Number - Number of person identified in data line <030> 9124620126 ext.	Contact Email Address - Email Address of person identified in data line <030> andrea.mathie@btctelcom.net
<010>	<015>	<020>	<030>	<032>	<039>

Financial Data Summary

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

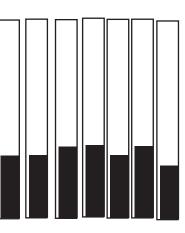
(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends



Certification - Reporting Carrier	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	220347
<015>	Study Area Name	BRANTLEY TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Andrea Mathie
<035>	Contact Telephone Number - Number of person identified in data line <030>	9124620126 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	andrea.mathie@btctelcom.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate. Name of Reporting Carrier: Signature of Authorized Officer: Date Printed name of Authorized Officer: Title or position of Authorized Officer: Telephone number of Authorized Officer: Study Area Code of Reporting Carrier: Filing Due Date for this form: Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

	tion - Agent / Carrier lection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	220347
<015>	Study Area Name	BRANTLEY TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Andrea Mathie
<035>	Contact Telephone Number - Number of person identified in data line <030>	9124620126 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	andrea.mathie@btctelcom.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier				
I certify that (Name of Agent) John Staurulakis, Inc is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.				
Name of Authorized Agent: John Staurulakis, Inc				
Name of Reporting Carrier: BRANTLEY TEL CO				
Signature of Authorized Officer: CERTIFIED ONLINE	Date: 06/25/2015			
Printed name of Authorized Officer: Donovan Strickland				
Title or position of Authorized Officer: Vice-President				
Telephone number of Authorized Officer: 9124625111 ext.				
Study Area Code of Reporting Carrier: 220347	Filing Due Date for this form: 07/01/2015			
	by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment e 18 of the United States Code, 18 U.S.C. § 1001.			

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recip	pients on Behalf of Reporting	g Carrier
as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service suppo e data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the inform	•	
ame of Reporting Carrier: BRANTLEY TEL CO	mation reported herein is accurate	•
ame of Authorized Agent or Employee of Agent: John Staurulakis, Inc.		
gnature of Authorized Agent or Employee of Agent: CERTIFIED ONLINE	Date:	06/25/2015
inted name of Authorized Agent or Employee of Agent: Bob Ragsdale		
tle or position of Authorized Agent or Employee of Agent Manager - Regulatory Affairs		
elephone number of Authorized Agent or Employee of Agent: 7705692105 ext.		
	01/2015	

Attachments

REDACTED – FOR PUBLIC INSPECTION

ATTACHMENT - LINE 112

Five-Year Network Improvement Plan and Progress Report

ATTACHMENT REDACTED IN ENTIRETY

The Brantley Telephone Company's demonstration of complying with applicable service quality standards and consumer protection rules for voice and broadband services:

In establishing this certification in its 2005 ETC Order,¹ the FCC found that an ETC must make "a specific commitment to objective measures to protect consumers." ² The Commission found that for wireless ETCs, compliance with CTIA's Consumer Code for Wireless Service would satisfy this requirement" and that the sufficiency of other commitments would be considered on a case-by-case basis.³ In this context, the FCC stated, "to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement."

Brantley Telephone Company, Inc. ("Brantley") hereby certifies that it is in compliance with applicable service quality standards and consumer protection rules. Brantley is subject to consumer protection obligations under Georgia state law. These obligations include, but are not limited to, the following: (1) filing a Local Exchange Tariff pursuant to the requirements of the Rules of the Georgia Public Service Commission which discloses rates, and terms and conditions of service to customers (Chapter 515-12-1-.02(5)(a) and .04(5) of the Rules of the Georgia Public Service Commission); (2) adherence to state

¹ Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) ("2005 ETC Order").

² *Id.* at para. 28.

³ *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: "(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy." *Id.* at n. 71.

Standards (Chapter 515-12-1-.17 and .18 of the Rules of the Georgia Public Service Commission); Customer Billing (Chapter 515-12-1-.04(4) of the Rules of the Georgia Public Service Commission; and Customer Complaints (Chapter 515-12-1-.08 of the Rules of the Georgia Public Service Commission); (3) truth-in-billing requirements (Chapter 515-12-1-.04(4) of the Rules of the Georgia Public Service Commission); and (4) CPNI, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

The Company is subject to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3. The Company furthermore will comply with all requirements set forth in the 2015 Open Internet Order when it becomes effective.

Brantley Telephone Company's demonstration of ability to function in emergency situations for voice and broadband services:

Brantley Telephone Company, Inc. ("Brantley") hereby certifies that it is able to function in emergency situations as set forth in 47 C.F.R. § 54.202(a)(2)¹ and Chapter 515-12-1-.11(4) of the Rules and Regulations of the State of Georgia. Brantley's network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2) and Chapter 515-12-1-.11(4) of the Rules and Regulations of the State of Georgia. Brantley can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow Brantley to manage traffic spikes throughout its network, as emergency situations require. In addition, Brantley has redundancy for connectivity purposes *via* additional routes and electronic equipment for voice and broadband services.

Specifically, each central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. Brantley has battery backup at all office locations and in its electronic equipment sites. Length of run time is determined by the equipment serving the area and the number of customers working out of the equipment. Generators are installed at all Central Office locations. They will continue to run as long as Brantley has access to fuel.

Section 54.202(a)(2) requires ETCs that are designated by the Commission to "demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations."

REDACTED FOR PUBLIC INSPECTION

(700) Pr	(700) Price Offerings	(700) Price Offerings including Voice Rate Data	ata				2 6	FCC Form 481	
Data CC	mection For	=					חל	OMB CORRES NO. 3060-0386/OMB CORRES NO. 3060-0319 July 2013	s control No. 3000-0819
<010>	Study Area Code	Code			220347				
<015>	Study Area Name	Name			BRANTLEY T	TEL CO			
<020>	Program Year	ear			2016				
<030>		Contact Name - Person USAC should contact regarding this data	contact regard	ling this data	Andrea Mathie	hie			
<035>		Contact Telephone Number - Number of person identified in data line <030>	er of person ide	entified in data line <	:030> 9124620126 ext.	ext.			
<039>		Contact Email Address - Email Address of person identified in data line <030>	ss of person id	entified in data line <		andrea.mathie@btctelcom.net			
<701>		Racidantial Local Samica Charae Effectiva Data	otive Date	1/1	1/1/2015				
<702>		Single State-wide Residential Local Service Charge	ervice Charge	1	1				
<703>									_
	<a1></a1>	<a2></a2>	<a3></a3>	b1>	 	<	 	<92>	\$
	State	Exchange (ILEC)	SAC (CETC)	Rate Type	Residential Local Service Rate	State Subscriber Line Charge	State Universal Service Fee	Mandatory Extended Area Service Charge	Total per line Rates and Fees
	GA	A11		FR	19.82	0.0	0.0	0.0	19.82

REDACTED FOR PUBLIC INSPECTION

(710) Broadband Price Offerings	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013
<010> Study Area Code	220347
<015> Study Area Name	BRANTLEY TEL CO

	Study Area Code	Code			22034/				
<015>	Study Area Name	Name			BRANTLEY TEL CO				
<020>	Program Year	ar			2016				
<030>	Contact Nai	Contact Name - Person USAC should contact regarding this data	d contact regarding 1	his data	Andrea Mathie				
<032>	Contact Tel	Contact Telephone Number - Number of person identified in data line <030>	er of person identifi	ed in data line <030>	9124620126 ext.				
<039>	Contact Em	Contact Email Address - Email Address of person identified in data line	ess of person identif	ied in data line <030>	. andrea.mathie@btctelcom.net	tctelcom.net			
<711>	<a1></a1>	<a2></a2>	 	 	<c> <d1></d1></c>	<q2></q2>	<q3></q3>		<44>>
	State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rates and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service - Broadband Service Usag Download Speed - Upload Speed (Mbps) (GB)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached {select}
	GA	All	54.95	0.0	54.95	6.0	1.0	0.666666	Other, No Usage Limit
	GA	A11	79.95	0.0	79.95	15.0	3.0	0.666666	Other, No Usage Limit
	GA	A11	99.95	0.0	99.95	25.0	10.0	0.666666	Other, No Usage Limit
	GA	A11	169.95	0.0	169.95	10.0	15.0	0.666666	Other, No Usage Limit

BASIC LOCAL EXCHANGE SERVICE

6.1 LOCAL EXCHANGE RATES

6.1.1 General

Basic Local Exchange Service is provided by means of station, wire, switching and other facilities, plant and equipment to enable the establishment of telephone communications between stations in the same or different exchanges at monthly rates as set forth below. The facilities, plant and equipment used to provide Basic Local Exchange Service are also used in the furnishing of toll telephone services at rates applicable for such services.

Pursuant to O.C.G.A. Section 46-5-166, effective November 1, 1996, basic single-line residence rates, basic single-line business rates and the associated touch-tone service rates are to be capped for five years. The rates for multi-line business accounts are not capped.

6.1.2 Base Rates

		EXCH	ANGE	
Class and Grade of Service	Hoboken	Hortense	Nahunta	Waynesville
Business 1-Party Flat Rate Tone	\$19.82 (I)	\$19.82 (I)	\$19.82 (I)	\$19.82 (I)
Residence 1-Party Flat Rate Tone	\$19.82(I)	\$19.82 (I)	\$19.82 (I)	\$19.82 (I)

- Rates and conditions for the provision of PBX and key systems have been moved to Section 8.
- Rates for Rotary Line service have been moved to Section 8.

Issued: November 25, 2014 Effective: January 1, 2015

Brantley Telephone Company, Inc. General Services Tariff

Section 8 Ninth Revised Page 5 Cancels Eighth Revised Page 5

MISCELLANEOUS SERVICE ARRANGEMENTS

8.1 SEASONAL AND VACATION SERVICE (Cont'd)

8.1.2 Rates and Charges

- A. Main Station Service
 - 1. The charge for Main Station Service during the period of suspension is fifty percent (50%) of the rate regularly charged.
- B. Key and PBX Systems
 - 1. The charge for Key and PBX systems during the period of suspension is fifty percent (50%) of the rates regularly charged.
- C. Additional Features and Charges
 - 1. The charge for advanced calling features during the period of suspension is fifty percent (50%) of the rate regularly charged.
 - 2. The charge for Brantley Plus Optional Calling Plan during the period of suspension is one hundred percent (100%) of the rate regularly charged.
 - 3. The charges for Universal Emergency Number Service-911, Dual Party Relay System, and Federal End User Common Line (EUCL) Charge during the period of suspension is one hundred percent (100%) of the rate regularly charged.

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8.2 ROTARY LINE SERVICE

8.2.1 General

A. Rotary Line Service is provided for the origination of telephone calls through the use of a rotary dial instead of a touchtone pad. Rotary Line Service is only available to existing Rotary Line customers. Rotary Line Service is being phased out and is not available to new customers.

8.2.2 Rates and Charges

		EXCH	ANGE	
Class and Grade of Service	Hoboken	Hortense	Nahunta	Waynesville
Business 1-Party Flat Rate Pulse	\$19.82 (I)	\$19.82 (I)	\$19.82 (I)	\$19.82 (I)
Residence 1-Party Flat Rate Pulse	\$19.82 (I)	\$19.82 (I)	\$19.82 (I)	\$19.82 (I)

Issued: November 25, 2014 Effective: January 1, 2015

MISCELLANEOUS SERVICE ARRANGEMENTS

8.13 LOW-INCOME PROGRAM

(C)

The Company, as part of its obligations as an Eligible Telecommunications Carrier, offers a low-income assistance program. This program, Lifeline Assistance, is offered under the terms and conditions provided below:

8.13.1 Lifeline Assistance

A. General

Lifeline Assistance is a non-transferable retail service offering for which qualifying low-income subscribers pay reduced charges, as provided for below. Lifeline Assistance enables eligible subscribers to pay reduced charges for voice telephony service that includes the following services: voice-grade access to the public switched network or its functional equivalent; local usage; access to emergency services; and toll limitation.

B. Regulations

Subscribers are eligible for Lifeline Assistance if:

- 1. The subscriber's household income is at or below 135 percent of the Federal Poverty Guidelines, or
- 2. The subscriber, or one or more of the subscriber's dependents or the subscriber's household, receives benefits from at least one of the following qualifying programs:

Medicaid;

Supplemental Nutrition Assistance Program (SNAP), formerly known as Food Stamps;

Supplemental Security Income (SSI);

Federal Public Housing Assistance;

Low-Income Home Energy Assistance Program (LIHEAP);

National School Lunch Program's free lunch program;

Temporary Assistance for Needy Families (TANF);

Low Income Senior Citizens discount plan offered by a local gas or power company

3. Other eligibility requirements may be established by the Commission.

Issued: July 30, 2012 Effective: June 1, 2012

MISCELLANEOUS SERVICE ARRANGEMENTS

8.13 <u>LOW-INCOME PROGRAM</u> (Cont'd)

(C)

8.13.1 Lifeline Assistance (Cont'd)

- B. Regulations (Cont'd)
 - 4. Each subscriber to Lifeline Assistance must certify in writing to the Company, under penalty of perjury, that s/he receives benefits under a program outlined in sub-paragraphs (B)(1) through (B)(3), above, and must, on that same document, agree to notify the Company if s/he ceases to participate in the program(s). The certification form shall conform to the requirements described herein, and shall be made available upon request to any subscriber. The Company shall retain all such subscriber certifications in order to furnish proof of subscriber eligibility as may be required from time to time by Universal Service administrators.
 - 5. A subscriber may elect at the time of subscription to Lifeline Assistance to receive toll limitation as part of Lifeline Assistance. "Toll limitation" is a service that allows a subscriber to elect not to allow the completion of outgoing toll calls from the subscriber's residence.
 - 6. Lifeline Assistance will not be disconnected for non-payment of toll charges, unless the Company first demonstrates to the Commission that the Company would incur substantial costs, that the Company offers toll limitation without charge, and that telephone subscribership among low-income subscribers in the Company's service area is greater than or equal to the national subscribership rate for low-income consumers. For purposes of this paragraph, a "low-income consumer" is one with an income below the poverty level for a family of four residing in Georgia. The Company shall follow all applicable notice provisions as established, from time to time, by the Commission, as part of the waiver process, and to implement a waiver, if granted. The Company may reapply for the waiver as necessary.
 - 7. The Company may not collect a service deposit in order to initiate Lifeline Assistance if the qualifying low-income subscriber voluntarily elects toll blocking from the Company, where available or if the qualifying low-income subscriber elects a calling plan that does not distinguish between toll and non-toll calls in its pricing. If toll blocking is unavailable, then the Company may charge a service deposit.

(Ċ)

Issued: July 30, 2012 Effective: June 1, 2012

MISCELLANEOUS SERVICE ARRANGEMENTS

8.13 <u>LOW-INCOME PROGRAM</u> (Cont'd)

(C)

(C)

8.13.1 Lifeline Assistance (Cont'd)

- C. Effective August 1, 2012, the Lifeline credit available to an eligible customer in Georgia is equal to the total of federal support as established by the Federal Communications Commission. The amount of credit will not exceed the charge for local service, which includes the access line, the Subscriber Line Charge and local usage.
- D. The Company shall apply the baseline payments received by the administrator of the federal Lifeline Assistance program to waive the qualifying customer's federal Subscriber Line Charge. The Company shall apply any additional federal support amount to the qualifying customer's basic local exchange service rate.
- E. To be eligible for Lifeline Assistance, qualifying customers must subscribe to a flat-rate basic local exchange service offering that is made available in the Company's service area.
 - F. Partial payments that are received from Lifeline customers shall first be applied to local service charges and then to any outstanding toll charges.

Issued: July 30, 2012 Effective: June 1, 2012

Brantley Telephone Company (SAC 220347)

Response to Line 3010 – Milestone Certification (47 CFR §54.313(f)(1)(i))

Brantley Telephone Company hereby certifies that throughout 2014, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream, and currently, it is taking reasonable steps to provide upon reasonable request actual speeds of at least 10 Mbps downstream/1 Mbps upstream broadband service at with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas as determined in an annual survey, and that requests for such service are met within a reasonable amount of time.

Brantley Telephone Company (SAC 220347)

Response to Line 3012 - List of Community Anchor Institutions to Which the ETC Newly Began Providing Service

The FCC's *USF/ICC Transformation Order* requires a listing of community anchor institutions to which the ETC newly began providing broadband service. Brantley Telephone Company hereby provides the FCC with a list of community anchor institutions to which it newly began providing broadband service since July, 2014.

Name	Address
Brantley Co Pre-K Program	12884 Cleveland St W, Nahunta
Brantley Family Care Center	13807 Cleveland St E Co 13, Nahunta
City Of Hoboken	537 Palm St, Hoboken
Golden Isle EMS	10305 Main St N, Nahunta
Waynesville Vol Fire	489 Tyson Rd, Waynesville
Waynesville Vol Fire-EMS	22041 Highway 82, Hortense
Winokur Hickox Volunteer Fire Department	18829 Highway 301, Folkston

REDACTED – FOR PUBLIC INSPECTION

ATTACHMENT - LINE 3017 ATTACHMENT REDACTED IN ENTIRETY